

Appl. No. : 09/900,487  
Filed : July 6, 2001

### REMARKS

Applicants' representative would initially like to thank Examiners Thein and Garg for the courtesy they extended during the interview conducted on April 27, 2004.

By the foregoing amendment, Applicants have canceled Claims 1-12, 38 and 39 and have added Claims 51-62. No new matter has been added.

#### I. Substance of Interview

During the interview, Applicants' representative pointed out specific features of Applicants' preferred embodiments that are not disclosed or suggested by Turnbull et al (US 2002/0103789 A1). In addition, Applicants' representative identified specific claim limitations in the independent claims that are not suggested by Turnbull et al. Examples of such claim limitations are set forth below.

#### II. Art-Based Rejection over Turnbull et al.

As discussed during the interview, Turnbull et al fails to teach many of the features of the preferred embodiments disclosed in the present application. For example, Turnbull et al does not disclose or suggest displaying to a user information about one or more of the user's orders that are related to the product or product category being viewed by the user. In this regard, Turnbull et al's system apparently records users' browsing and purchasing activities solely for other purposes, such as to assist the user in browsing and searching for content pages that correspond to the user's past browsing activities (see, e.g., paragraphs 72, 78 and 89), or to allow users to view their browsing histories (see, e.g., paragraphs 68-70 and 78).

Turnbull et al's system also differs fundamentally from Applicants' preferred embodiments in that it apparently requires users to download and run a special SideCart interface program on their respective computers. This SideCart interface is a browser plug-in that creates a special window or pane 60 within the user's browser to display the various content (customized directory structures, browsing histories, etc.) generated by Turnbull et al's system. See, e.g., Figures 3-5 and paragraphs 74 and 78 of Turnbull et al. Thus, for example, to provide "purchase receipt management" and "shipment tracking" as briefly mentioned in paragraph 72, Turnbull et al would apparently display within its SideCart interface special links, browsing history data, or other content for accessing such functionality, as opposed to supplementing a web page requested by the user.

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In contrast, in Applicants' preferred embodiments, information about related orders is presented to users by having the server system supplement web pages requested by such users. This is a much simpler approach from the user's perspective, as it does not require users to download and run a special browser plug-in, and does not reduce the amount of screen real estate that is generally available for viewing web pages. Turnbull et al teaches away from this approach by emphasizing the importance of offloading the directory customization task from the commerce domain's server to the SideCart interface. See paragraph 74 ("Offloading this framework... into the inventive interface reduces the content serving responsibilities of the commerce domain quite substantially.... In addition to reducing the commerce domain's server load, the real-time feedback displayed in the inventive interface is able to improve individual interaction....").

In fact, in paragraph 78, Turnbull et al goes as far as suggesting that the pages of the commerce web site should remain static: "Accordingly, related links for a product are not necessarily implemented within the text of a product page; rather, they are implemented within the SideCart interface of the invention. In this manner, a static page will find it easier to be indexed by search engines, because its information content is more uniform." Thus, even if Turnbull et al could somehow be read as suggesting the display of order information related to the page the user is viewing, it cannot be read as suggesting that this information be incorporated into the web page by the server.

In view of these and other differences, Applicants submit that Turnbull et al does not disclose or suggest all of the limitations of any pending independent claim. With respect to independent Claim 27, for example, Turnbull et al does not disclose or suggest a server system that "is responsive to a request from a customer for a page from the electronic catalog by supplementing the page with information about a related order placed by the customer" such that "customers are presented with context-dependent information about related orders during browsing of the electronic catalog," within the context of the other claim limitations.

With respect to independent Claim 32, Turnbull et al does not disclose or suggest responding to a user's request for a product detail page by supplementing the product detail page with at least an indication that the user previously purchased the product, within the context of the other claim limitations.

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With respect to independent Claim 46, Turnbull et al does not disclose or suggest a server system that is responsive to a request from a user for a product detail page of an electronic catalog by (1) determining whether the user previously placed an order that is related to the product represented within the product detail page, and (2) if the user placed such a related order, supplementing the product detail page with information about the related order for presentation to the user, whereby the server system reduces a likelihood that the user will place an unnecessary or undesirable order for the product. In connection with this claim, Applicants respectfully challenge the Examiner's use of Official Notice to the extent the Examiner is asserting that it was well known, at the time of the invention and in the context of an electronic catalog system, to reduce a likelihood that a user will place an unnecessary or undesirable order.

With respect to independent Claim 53, Turnbull et al does not disclose or suggest a method that comprises responding to a user request for a page that displays a subset of the items in an electronic catalog by "(a) identifying a related order previously placed by the user, said related order being related to the subset, (b) supplementing the page of the electronic catalog with information about the related order, and (c) returning the page of the electronic catalog, as supplemented with the information about the related order, from the server system to the client program for presentation to the user," within the context of the other claim limitations.

Because Turnbull et al does not disclose or suggest all of the limitations of any independent claim, Applicants submit that all of the pending claims are patentably distinct from Turnbull et al. Additional distinctions over Turnbull et al are recited in the dependent claims.

By focusing on specific claims and claim limitations in the discussion above, Applicants do not intend to imply an agreement with the Examiner's assertions regarding other claims and claim limitations. In addition, as Turnbull et al was published after Applicants' filing date, Applicants reserve the right to later establish that Turnbull et al is not prior art.

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If any issues remain which can potentially be resolved by telephone, the Examiner is invited to call the undersigned attorney of record at his direct dial number of 949-721-2950.

Respectfully submitted,

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